

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**COMMONWEALTH OF PUERTO RICO, et al.,**

Defendants.

CIVIL NO. 12-2039 (GAG)

**MOTION TO WITHDRAW AS COUNSEL**

TO THE HONORABLE COURT:

COME NOW Counsel for Defendants Commonwealth of Puerto Rico and Puerto Rico Police Department (“Defendants”), and respectfully state and request as follows:

1. As a result of irreconcilable differences with the Department of Public Safety (“DPS”) on matters regarding the Puerto Rico Police Bureau’s (“PRPB”) implementation of the Reform process and the designation of responsibilities among the DPS and the PRPB, McConnell Valdés LLC and the undersigned counsel hereby file this motion to withdraw as counsel in the above captioned case.

2. Despite undersigned counsel’s efforts to resolve those differences, the DPS opted to engage new counsel for the PRPB, without first notifying the undersigned counsel nor, to the best of our knowledge, the PRPB.

3. Undersigned counsel are satisfied that during the time we served as counsel in this case, we always strived to promote the best interests of the Commonwealth, and particularly the PRPB, as well as support their commitment to reform the Puerto Rico Police pursuant to the Reform Agreement and best policing practices, working collaboratively with the PRPB, the USDOJ, Monitor Romero and Special Master Del Carmen. In the past year and a half, much progress was made by the PRPB in the Reform process, including the adoption of monitoring methodologies for each of the eleven (11) Reform areas

(which methodologies did not exist when we first joined the case), the adoption of important policies and procedures, and significant progress on the sampling method for the monitoring process.

4. We thank the PRPB's management, in particular the Reform Office, for the trust they deposited in undersigned counsel and our efforts in the case, which as indicated above, were always to support the important Reform process. We also thank the teams of the USDOJ, Monitor Romero and Special Master Del Carmen in their respective efforts to support the PRPB's Reform process.

5. A copy of this motion will be delivered to the PRPB.

**WHEREFORE**, the undersigned counsel respectfully request that the Court grant them leave to withdraw as counsel of record in the captioned case.

**RESPECTFULLY SUBMITTED.**

**WE HEREBY CERTIFY:** That today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico, using the CM/ECF system which will send a copy and notification of filing to all counsel of record.

In San Juan, Puerto Rico, this 4<sup>th</sup> day of August 2020.

By:

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